The Honorable Mignon Clyburn
Acting Chairwoman
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: Modernizing the E-rate Program for Schools and Libraries
      WC Docket No. 13-184; **Ex Parte Presentation**

Dear Chairwoman Clyburn,

As the Federal Communications Commission ("FCC") prepares to modernize the Schools and Libraries component of its Universal Service program (commonly referred to as the "E-rate program") to meet the demands of a new era of Internet connectivity, the Rural Community College Alliance (the "RCCA") strongly urges an expansion of the program to ensure universal service is first achieved for all of our nation's students before the program shifts its focus to higher-capacity connectivity for already-connected schools. Specifically, for the reasons set forth below, the RCCA respectfully requests that eligibility for "priority one" services funding be expanded to include non-profit community colleges.

At present, eligibility for participation in the E-rate program is codified in Section 254 of the Telecommunications Act of 1996, and is narrowly confined to elementary and secondary schools. However, at the time of the Act's drafting, Congress granted the FCC explicit authority to modify and expand the program in precisely the manner submitted by the RCCA. In its Joint Explanatory Statement accompanying the Telecommunications Act, Congress stated: "The [Federal Communication] Commission is given specific authority to alter the definition [of universal service] from time to time, and to provide a different definition for schools, libraries, and health care facilities."[1] Modification of the E-rate program to include non-profit community colleges with endowments of less than $50 million is consistent with current restrictions on eligible schools, within the legislative authority of the FCC, and minimally expansive to the program.

Since its inception in 1996, the E-rate program has been tremendously successful in the first phase of its mission to ensure that schools and libraries obtain access to the kinds of advanced telecommunications services necessary to harness the power of the new Internet age. Having connected over 97% of our country's primary and secondary schools to the Internet, the FCC is now preparing to launch the next phase of the program, informally named "E-rate 2.0." However, the RCCA wishes to stress that the fundamental goal envisioned by the Universal Service program's authors to "open new worlds of knowledge, learning and education to all Americans - rich and poor, rural and

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[1] *See* Senate Report 104-230, 104th Congress, 2d Session, p. 131 (February 1, 1996).

urban"[2] cannot not be met, and the E-rate program cannot be truly considered "modernized", until qualified postsecondary educational institutions are given equal opportunities to obtain at least basic connectivity to the Internet.

Community and technical colleges like RCCA's member institutions play an increasingly vital role not only in a comprehensive national educational strategy, but in our nation's overall economic viability. These postsecondary schools offer access to higher education to the most diverse student body in the history of American education: according to the National Center for Education Statistics ("NCES"), 47% of first generation college students, 53% of Hispanic students, 45% of Black students, 52% of Native American students, and 45% of Asian/Pacific Islander students attend community colleges.[3] The next generation of our nation's workforce looks to community colleges to prepare them for the rapidly evolving and increasingly specialized workplace. Over half of our nation's healthcare workers and registered nurses, and over 80% of first responders (such as EMTs, firefighters and police officers) obtain their postsecondary credentials at community colleges.[4] Similarly, 40% of teachers have taken a math or science course at a community college, and 44% of science and engineering graduates attended a community college as part of their postsecondary education.[5] The credentials, certifications and degrees obtained at community colleges greatly enhance the lifetime earning potential for the students to achieve them. Students who earn associates degrees can expect to earn roughly $500,000 more than a worker with no postsecondary education and a worker with a bachelor's degree can earn $1.6 million more.[6] In sum, "community colleges have become the institutions of choice for workers upgrading their skills and for displaced workers preparing to reenter the workforce."[7]

Since the initial eligibility for participation in the E-rate program was codified in 1996, the role of the community college in providing continuing educational opportunities for an increasingly high-skill workforce has only intensified. When the E-rate program was first established, just over 5.5 million students were enrolled in two-year institutions. By 2010, that number had increased nearly 40% to 7.68 million.[8] In the decade between 2000 and 2010, the number of awarded associate's degrees increased by over 50%, to nearly 850,000 degrees awarded per year - the largest increase among all postsecondary degrees.[9] The demand for professional certificates and postsecondary degrees has reached an all-time high in the wake of the Great Recession, with enrollment in community colleges increasing by more than 20% to over 8.2 million students between 2007 and 2010 (an increase of over 1.4 million students).[10] In uncertain economic times, community colleges represent an affordable option for high school graduates and adult

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[2] *See* Senate Report 104-230, 104th Congress, 2d Session, p. 130 (February 1, 1996).
[3] *See* Integrated Postsecondary Education Data System (IPEDS) Fall Enrollment Study, National Center for Education Statistics (2007).
[4] *See* Winning the Skills Race and Strengthening America's Middle Class: An Action Agenda for Community Colleges, National Commission on Community Colleges (January 2008).
[5] *See* Community Colleges Impact K-12 STEM Teaching, Madeline Patton (2008).
[6] *See* Help Wanted: Projections of Jobs and Education Requirements through 2018, Carnavale, A; Smith, N; and Strohl, J. (2010).
[7] Boggs, George R. (2012). Democracy's Colleges: The Evolution of the Community College in America, p. 1.
[8] *See* State of Education 2012, p. 164, National Center for Education Statistics.
[9] *See* State of Education 2012, p. 111, National Center for Education Statistics.
[10] *See* Community College Estimated Growth: Fall 2010, Phillippe, K; and Mullin, C. (February 2011).

learners seeking professional development, with average tuition rates of only $2,544 per year.[11]

Rural community colleges in particular have become essential in enabling our nation's workforce to effectively transition to a knowledge-based economy. As agricultural and extractive industries continue to disappear, workers in rural communities are turning to community colleges to upgrade their academic and vocational skill sets to meet the demands of a technology-based 21st century global economy. It should therefore come as no surprise that, despite low per capita income, low population density, and low total population in rural areas, "rural community colleges are the fastest-growing of all community colleges in the United States."[12] At present, rural community colleges serve 3.4 million students, or 37% of all community college students enrolled nationwide.[13]

However, while community colleges have admirably risen to meet the demands of an increasingly diverse, economically distressed and rapidly expanding student body, they have been systematically excluded from the Internet-age education revolution, and are now in danger of being left behind permanently. As of 2007, only 16% of our nation's 1,138 public two-year institutions were able to connect to the Internet at broadband speeds comparable to those of American research universities.[14] Connectivity in rural areas is particularly and predictably poor: according to a report prepared by the National Telecommunications & Information Administration ("NTIA"), only 14.4% of students residing in a "very rural" area have access to Internet speeds sufficient to enable satisfactory online distance learning.[15] Given their geography, rural community colleges often face both middle and last-mile market inefficiencies when seeking to expend broadband connectivity to their campuses, and lack the substantial endowments and alumni giving campaigns that enable larger schools to afford the up-front investment costs.

As more students turn to online and distance learning to gain specialized expertise, vocational training and technical certification, the need for high-speed internet connectivity, streaming video and pedagogical content-sharing across campuses and regions is growing rapidly, and it is imperative that qualified community colleges gain access to the "first priority" subsidies offered by the E-rate program. The FCC"s own National Broadband Plan acknowledges that, "[w]ith adequate funding and innovative technology development, community colleges can offer college credit for online courses for advanced high school students; offer specialized science and technology online learning experiences in subjects where there are too few specialized K–12 teachers; support adult students through personalized career and technical programs while working around the needs of their jobs and families; and extend continuing education programs by

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[11] *See* Trends in College Pricing, 2009, College Board (2009).

[12] Nelson, Libby (February 24, 2010). More Students and Not Enough Space: Rural Community Colleges Discuss Challenges, p. 1.

[13] *See* Fast Facts, Rural Community College Alliance, available online at http://www.ruralccalliance.org (2013).

[14] *See* Educause, Core Data Service, Fiscal Year 2007 Summary Report, p. 35 (2007) (reporting that only 16.1% of colleges offering an associate's degree have more than 45 Mbps in bandwidth, whereas 90.4% of institutions offering a doctorate have that level of connectivity).

[15] *See* NTIA Report, Broadband Availability Beyond the Rural/Urban Divide, May 2013 (reporting that the minimum Internet speed at which consumers rated distance learning as a "good" experience was 50Mbps, a speed available to only 14.4% of "Very Rural" residents).

offering diverse, quality content to the public to foster job skills, community development and personal growth."[16]
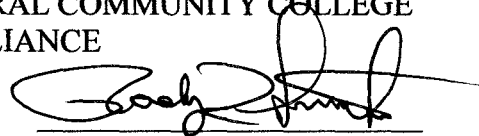
Expansion of universal service support should also encompass the libraries of qualified community colleges. Many of the RCCA's member institutions report that their school libraries serve as the only "public" library for their entire rural community. Denying such libraries the benefits of universal service subsidies is antithetical to the very purpose of the program. Where such community college libraries serve their communities by offering public access to their facilities, expanding the E-rate program to foster their high-speed connectivity is a logical next step in the progression of modernizing the program.

Community colleges (to include technical colleges, two year independent colleges under a four year university and tribal colleges) are at a crucial junction; demand for continuing education is historically high at a time when technology enables more classes to be taught, more knowledge and training to be shared, and more students to be reached than ever before. The RCCA respectfully requests that the support mechanisms offered under E-rate program, which so effectively connected our nations K-12 classrooms to the Internet, be made available to community colleges and their libraries now, when the need is greatest and before the opportunity is lost in the program's evolution.

Respectfully submitted,

RURAL COMMUNITY COLLEGE
ALLIANCE

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[16] Federal Communications Commission, National Broadband Plan, p. 257-258 (2013).